

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

THE HOSPITAL AUTHORITY OF
METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON COUNTY,
TENNESSEE, d/b/a NASHVILLE GENERAL
HOSPITAL and AMERICAN FEDERATION OF
STATE, COUNTY AND MUNICIPAL
EMPLOYEES DISTRICT COUNCIL 37 HEALTH
& SECURITY PLAN,

Plaintiffs,

v.

MOMENTA PHARMACEUTICALS, INC. and
SANDOZ INC.,

Defendants.

Civil Action No. 3:15-cv-01100

Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Barbara D. Holmes

**PLAINTIFFS' NOTICE OF SUBMISSION OF [PROPOSED] FINAL JUDGMENT
REGARDING CLASS SETTLEMENT WITH DEFENDANT SANDOZ INC.**

Plaintiffs The Hospital Authority of Metropolitan Government of Nashville and Davidson County and American Federation of State, County and Municipal Employees District Council 37 Health and Security Plan, by and through their undersigned counsel, hereby submit this [Proposed] Final Judgment Regarding Class Settlement With Defendant Sandoz pursuant to Federal Rule of Civil Procedure 54(b).

1. The Court granted Plaintiffs' Motion for Final Approval of Settlement (Doc. 511) on May 29, 2020 (Doc. 521). Pursuant to Paragraph 11 of the Settlement Agreement, (Doc. 486-2), Defendant Sandoz paid the balance of the Settlement Amount into the Escrow Account on June 3, 2020.

2. Plaintiffs therefore respectfully request the Court enter the [Proposed] Final Judgment Regarding Class Settlement With Defendant Sandoz Inc., attached hereto as Exhibit A.

Dated: June 4, 2020

Respectfully submitted,

/s/ Brendan P. Glackin

Brendan P. Glackin (*pro hac vice*)

Dean M. Harvey (*pro hac vice*)

Bruce W. Leppla (*pro hac vice*)

Katherine Lubin Benson (*pro hac vice*)

David T. Rudolph (*pro hac vice*)

Adam Gitlin (*pro hac vice*)

Michelle A. Lamy (*pro hac vice*)

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

275 Battery Street, 29th Floor

San Francisco, CA 94611-3339

Telephone: (415) 956-1000

Facsimile: (415) 956-1008

Mark P. Chalos (TN State Bar No. 19328)
Andrew R. Kaufman (TN State Bar No. 33864)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
222 Second Avenue, Suite 1640
Nashville, TN 37201
Telephone: (615) 313-9000
Facsimile: (615) 313-9965

*Class Counsel on Behalf of Class Representatives
Nashville General and DC 37 and the Class*

John T. Spragens (TN State Bar No. 31445)
SPRAGENS LAW PLC
1200 16th Ave. S.
Nashville, TN 37212
Telephone: (615) 983-8900
Facsimile: (615) 682-8533

Additional Counsel for Class Representatives

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of June, 2020, the foregoing document was filed electronically with the U.S. District Court for the Middle District of Tennessee. Notice of this filing was served via the court's electronic filing system on counsel listed below:

Timothy L. Warnock (TN Bar No. 12844)
Stuart A. Burkhalter (TN Bar No. 29078)
RILEY WARNOCK & JACOBSON, PLC
1906 West End Avenue
Nashville, TN 37203
Telephone: (615) 320-3700
Facsimile: (615) 320-3737

Matthew D. Kent (*pro hac vice*)
Liz Brodway Brown (*pro hac vice*)
D. Andrew Hatchett (*pro hac vice*)
Michael P. Kenny (*pro hac vice*)
Anthony Thomas Greene (*pro hac vice*)
Kara F. Kennedy (*pro hac vice*)
ALSTON & BIRD LLP
One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424
Telephone: (404) 881-7000
Facsimile: (404) 881-7777

Teresa T. Bonder (*pro hac vice*)
Nell G. Moley (*pro hac vice*)
Jean E. Richmann (*pro hac vice*)
ALSTON & BIRD LLP
560 Mission Street, Suite 2100
San Francisco, CA 94105
Telephone: (415) 243-1000
Facsimile: (415) 243-1001

Attorneys for Sandoz Inc.

R. Dale Grimes (TN Bar No. 6223)
Virginia M. Yetter (TN Bar No. 31471)
BASS, BERRY & SIMS PLC
150 Third Avenue South, Suite 2800
Nashville, TN 37201
Telephone: (615) 742-6200

Jason T. Murata (*pro hac vice*)
Brooke Jones Oppenheimer (*pro hac vice*)
Thomas G. Rohback (*pro hac vice*)
AXINN, VELTROP & HARKRIDER LLP
90 State House Square
Hartford, CT 06103
Telephone: (860) 275-8100
Facsimile: (860) 275-8101

Carmel Rana Arikat (*pro hac vice*)
Richard B. Dagen (*pro hac vice*)
Bradley D. Justus (*pro hac vice*)
Michael L. Keeley (*pro hac vice*)
Daniel K. Oakes (*pro hac vice*)
Jetta C. Sandin (*pro hac vice*)
AXINN, VELTROP & HARKRIDER LLP
950 F Street, NW
Washington, DC 20004
Telephone: (202) 912-4700
Facsimile: (202) 912-4701

Carol Xianxiao Liu (*pro hac vice*)
Varnitha Siva (*pro hac vice*)
AXINN, VELTROP & HARKRIDER LLP
114 West 47th Street
New York, NY 10036
Telephone: (212) 728-2200
Facsimile: (212) 728-2201

Juanita R. Brooks (*pro hac vice*)
Roger Alen Denning (*pro hac vice*)
Tucker N. Terhufen
FISH & RICHARDSON, P.C.
12390 El Camino Real
San Diego, CA 92130
Telephone: (858) 678-5070
Facsimile: (858) 678-5099

Attorneys for Momenta Pharmaceuticals, Inc.

/s/Katherine Lubin Benson

Katherine Lubin Benson